

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA**

**CIVIL ACTION FILE NO. 5:23-cv-00059**

**CROWN EQUIPMENT CORPORATION**

**Plaintiff,**

**v.**

**DAVID BRADY, WILLIAM TUCKER,  
JOSEPH BOGGS, BRAWTUS  
HOLDING COMPANY, INC. (f/k/a  
Pneu-Mech Systems Manufacturing,  
Inc.), BRAWTUS, MANAGEMENT  
COMPANY, LLC, PNEU-MECH  
SYSTEMS MANUFACTURING, LLC  
(K.N.A. Pneu-Mech Dissolution, LLC),  
PNEU-MECH SYSTEMS  
MANUFACTURING, INC., UNITED  
FINISHING SYSTEMS LLC,**

**Defendants,**

**v.**

**James Andrews and Jerry Trostle,  
Third Party Defendants.**

**Motion for Extension of Time**

Third-Party Defendants James Andrews and Jerry Trostle, by and through their undersigned counsel, hereby move for an Order extending the time in which to serve Rule 26 Disclosures. In support of this motion, Third-Party Defendants submit the following:

1. Third-Party Claimants filed the Third-party Complaint in this action on May 2, 2024, in United States District Court for Western District of North Carolina.
2. Counsel for Third-Party Defendants filed a Notice of Appearance on May 13, 2024.
3. Pursuant to this Court's April 22, 2024 Pretrial Order and Case Management Plan, initial disclosures were due May 8, 2024.

4. Counsel for Third- Party Defendants requires additional time to prepare Initial Disclosures, up to and including May 29, 2024.

5. The Third-Party Defendants make this Motion for an extension of time in which to provide Initial Disclosures for good cause and not for purposes of unnecessary delay.

**WHEREFORE**, Third-Party Defendants, James Andrews and Jerry Trostle, respectfully request an extension of time from May 8, 2024, up to and including May 29, 2024 in which to serve Initial Disclosures on all other Parties.

This the 21<sup>st</sup> day of May, 2024.

**HULL & CHANDLER, P.A.**

By: /s/ Elizabeth Venum  
Elizabeth Venum  
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*Counsel for Third-Party Defendants*

**Certificate of Service**

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of this filing and an electronic copy of same to all counsel of record registered with the CM/ECF system.

This the 21<sup>st</sup> May, 2024,

**HULL & CHANDLER, P.A.**

By: /s/ Elizabeth Vennum  
Elizabeth Vennum